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25           **UNITED STATES DISTRICT COURT  
26           NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**

27       CHASOM BROWN, MONIQUE  
28       TRUJILLO, WILLIAM BYATT, JEREMY  
29       DAVIS, and CHRISTOPHER CASTILLO,  
30       individually and on behalf of all similarly  
31       situated,

32       Plaintiffs,

33       v.

34       GOOGLE LLC,  
35       Defendant.

36           Case No. 4:20-cv-03664-YGR-SVK

37           **JOINT STIPULATION AND [PROPOSED]  
38       ORDER EXTENDING TIME FOR  
39       GOOGLE TO SUBMIT DECLARATION  
40       IN SUPPORT OF PLAINTIFFS' MOTION  
41       TO SEAL (DKT. 429)**

42       Referral: The Honorable Susan van Keulen

1 Pursuant to Civil Local Rule 6-2 and 7-12, this joint stipulation is entered into between  
 2 Plaintiffs and Google LLC (“Google”), collectively referred to as the “Parties.”

3 WHEREAS, on February 26, 2022, Plaintiffs filed their Administrative Motion To Consider  
 4 Whether Portions Of Plaintiffs’ Request For Order To Show Cause Re: Sanctions For Google’s  
 5 Discovery Misconduct (“Motion to Seal”) (Dkt. 429);

6 WHEREAS, on February 26, 2022, Google received unredacted copies of Plaintiffs’ Motion  
 7 to Seal and exhibits, approximately 25 of which were designated to be sealed and submitted with  
 8 Dkts. 429, 430;

9 WHEREAS, pursuant to Civil Local Rule 79-5(e), the current deadline for Google, as the  
 10 Designating Party to Plaintiffs’ Motion to Seal (Dkt. 429), to establish that such designated material  
 11 is sealable, is by Saturday, March 5, 2022;

12 WHEREAS, the Parties agree that an extension of time of 11 days will provide Google with  
 13 sufficient time to respond to Plaintiffs’ Motion to Seal (Dkt. 429);

14 NOW THEREFORE, the Parties stipulate to extend the deadline by which Google shall  
 15 submit a Declaration in support of Plaintiffs’ Motion to Seal (Dkt. 429), to March 16, 2022.

16 DATED: March 1, 2022  
 17

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59      *Attorneys for Plaintiffs*

## **ATTESTATION OF CONCURRENCE**

I am the ECF user whose ID and password are being used to file this JOINT STIPULATION AND [PROPOSED] ORDER EXTENDING TIME FOR JOINT STIPULATION AND [PROPOSED] ORDER EXTENDING TIME FOR GOOGLE TO SUBMIT DECLARATION IN SUPPORT OF PLAINTIFFS' MOTION TO SEAL (DKT. 429). Pursuant to Civil L.R. 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in the filing of this document.

Dated: March 1, 2022

By                    /s/ Andrew H. Schapiro

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Andrew H. Schapiro

*Counsel on behalf of Google*

1                   **[PROPOSED] ORDER**

2 Pursuant to stipulation of the Parties, the Court hereby **ORDERS:**

3                   The deadline for Google to submit a Declaration in support of Plaintiffs' Motion to Seal  
4 (Dkt. 429), shall be extended to March 16, 2022.

5

6                   **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

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8 DATED: March 2, 2022

  
\_\_\_\_\_  
HONORABLE SUSAN VAN KEULEN  
United States Magistrate Judge

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